

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Case No. _____

Sandy Hanebrink,)	
)	
Plaintiff,)	
)	
v.)	NOTICE OF REMOVAL
)	
The City of Simpsonville, TRZ)	
Management, LLC, and John Does 1-3,)	
)	
Defendants,)	
_____)	

Pursuant to the provisions of Title 28, United States Code, § 1446(a), as amended, notice is hereby given by the Defendant, City of Simpsonville, that the above-entitled matter is hereby removed from the Court of Common Pleas, Greenville County, South Carolina, to the United States Court for the District of South Carolina, Greenville Division, on the grounds that:

1. This is a civil action of which this court has original jurisdiction under the provisions of 28 U.S.C. § 1441, *et. seq.* and § 1443. This action is brought by the Plaintiff under the Americans With Disabilities Act alleging that the Defendants discriminated against her as a disabled person. This Court also has concurrent jurisdiction of the Plaintiff's causes of action which are matters of State common and statutory law, including premises liability, negligence, gross negligence, and recklessness.

2. The Summons and Complaint in this matter were filed with the Clerk of Court for the County of Greenville, State of South Carolina on September 13, 2018 and were served on January 3, 2019. In accordance with the requirements of 28 U.S.C. § 1446(b),

this Notice of Removal is filed within thirty (30) days after the service of the Summons and Complaint on Defendant.

3. Defendant hereby gives written notice of this Notice of Removal to the Plaintiffs and file a copy of this Notice of Removal with the Clerk of Court in the Court of Common Pleas of Greenville County, State of South Carolina.

4. There are additional Defendants in this lawsuit whose thirty (30) days to join in this Notice of Removal have not run. For that reason, this Notice is being filed for the Defendant, City of Simpsonville, only.

s/James D. Jolly, Jr.
James D. Jolly, Jr.
Federal ID 1410
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Anderson, South Carolina
Dated: January 31, 2019